

BROMBERG LAW LLC

Yael Bromberg, Esq., Principal*
T: (212) 859-5083 | F: (201) 586-0427
ybromberg@brombergllc.com

43 West 43rd Street, Suite 32
New York, NY 10036-7424
P.O. Box 1131
Glen Rock, NJ 07452-1131

March 13, 2024

VIA ELECTRONIC FILING
Hon. Zahid N. Quraishi, U.S.D.J.
United State District Court of the District of New Jersey
Clarkson S. Fisher Building
402 East State Street
Trenton, NJ 08608

Re: Kim, et al. v. Hanlon, et al.
Civil Action No.: 24-1098(ZNQ)(TJB)

Dear Judge Quraishi:

We are endeavoring to secure the availability of an expert witness, Ryan Macias, to testify for the evidentiary hearing to be held on Monday March 18, 2024. Mr. Macias is a national and international subject matter expert with over eighteen years of experience in election technology, security, and policy. Next week, Mr. Macias is registered to attend the 2024 Summit for Democracy under the Presidential Initiative for Democratic Renewal. The summit is being held in Korea, and co-chaired by Secretary of State Antony J. Blinken and the Prime Minister of South Korea. Mr. Macias was disclosed to Defendants as a potential witness in a supplemental witness list sent on March 12, 2024, which updated a prior tentative witness list sent to Defendants on March 11, 2024.

Accordingly, we respectfully request the Court's permission for Mr. Macias to join us in the federal courthouse via zoom to testify on March 18, 2024, assuming the court's technology permits for such an arrangement. Alternatively, Mr. Macias intends to join us in person.

We would appreciate your advisement by Friday March 15, 2024 at 3pm so that Mr. Macias can arrange his domestic or international travel appropriately.

Thank you in advance for your consideration,



Yael Bromberg, Esq.
Co-counsel for Plaintiffs

* Licensed to practice in New Jersey, New York, and the District of Columbia